

HMICFRS Report Recommendations

Traffic Light Colour	Definition of target achievement
GREEN	The recommendation is implemented
AMBER	The recommendation is subject to ongoing work and monitoring but is anticipated will be implemented
RED	The recommendation is beyond designated deadline or cannot / will not be implemented (rationale required) or
WHITE	The recommendation is not CoLP responsibility to deliver or is dependent upon another organisation delivering a product.

Roads Policing – Not Optional

A **National** report HMICFRS

Published 15th July 2020

There are 9 recommendations for the force, 2 are completed, 1 closed [not applicable] and 6 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<u>Recommendation</u> By 1 August 2021, the Department for Transport and the Home Office should develop and publish a national road safety strategy that provides clear guidance to the police, local authorities, highways agencies and other strategic partners. The strategy should include an explanation of the roles and responsibilities of each agency and the expectations of central government.	WHITE	August 2021	This action is for the Department of Transport and the Home Office

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendation</u> By 1 August 2021, the Home Office should revise the Strategic Policing Requirement to include an explicit reference to roads policing. Any revision should also include guidance on which bodies the requirement to collaborate with extends to.	WHITE	August 2021	This action is for the Home Office
3	<u>Recommendation</u> By 1 April 2021, the Home Office should use the statutory power under section 7(4) of the Police Reform and Social Responsibility Act 2011 to issue guidance on what should be included within future police and crime plans. The guidance should require reference to roads policing in all police and crime plans.	WHITE	April 2021	This action is for the Home Office
4	<u>Recommendation</u> With immediate effect, chief constables should make sure that roads policing is included in their force's strategic threat and risk assessments, which should identify the areas of highest harm and risk and the appropriate responses.	NEW GREEN	August 2020	Road policing was previously included within the force Strategic Threat and Risk Assessment [STRA] process. This is being looked at again through the force Transform Programme examining current and future demand and resourcing the new model. Recent findings from the Parliamentary Advisory Council for Transport Safety and HMICFRS reports are being fed into Transform proposals. A force STRA process is due to commence later this year [2020] so all areas of the force will be subject to a STRA review. The Roads Policing STRA will be undertaken annually.

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<u>Recommendation</u> By 1 April 2021, the National Police Chiefs' Council should review the role and structure of national roads policing operations and intelligence.	WHITE	April 2021	This action is for the NPCC.
6	<u>Recommendation</u> With immediate effect, chief constables should make sure: <ul style="list-style-type: none"> [1]their force has enough analytical capability (including that provided by road safety partnerships) to identify risks and threats on the road network within their force area; [2]that information shared by partners relating to road safety is used effectively to reduce those risks and threats; and [3]there is evaluation of road safety initiatives to establish their effectiveness. 	AMBER	September 2020 for an initial position November 2020 for review	<u>[bullet 1] analytical capability</u> Sustained analytical support has been an issue for the Roads Policing unit. The Force Intelligence Unit, who provide this support is aware of the issue and has produced a dashboard which it intends to maintain on a quarterly basis. The City of London partners have no analytical capability. Deadline set for November 2020 for review. <u>[bullet 2] Information shared</u> Current data accuracy hinders sharing information, the lack of analytical support has hampered progress. This issue of the disjoint between data sets used by CoLP and the CoL was highlighted in the Road Danger Reduction and Active Travel Plan (submitted to the July PAB). Increase support has been provided to this function. Deadline set for November 2020 for review to establish if increased support is improving the situation.

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p><u>[bullet 3] evaluation of road safety initiatives</u></p> <p>This area requires development in partnership with the City of London. A meeting took place with the City's Strategic Transportation Team lead to discuss and these will be monthly moving forward.</p> <p>However, there seems to be an expectation that City of London Police provide the analysis for the City of London to use.</p>
7	<p><u>Recommendation</u></p> <p>By 1 August 2021, the Department for Transport, in consultation with the Home Office and the Welsh government should review and refresh Department for Transport Circular 1/2007. The Circular should include a requirement that forces, or local road safety partnerships should publish the annual revenue received as a result of the provision of driver offending-related training and how that revenue has been spent.</p>	WHITE	August 2021	This action is for the Dept. of Transport and the Welsh Govt.
8	<p><u>Recommendation</u></p> <p>With immediate effect, chief constables should make sure that their force (or where applicable road safety partnerships of which their force is a member), comply with (the current version of) Department for Transport Circular 1/2007 in relation to the use of speed and red-light cameras.</p>	AMBER	December 2020 [for initial review]	<p>Department of Transport Circular 1/2007 is being reviewed and its requirements and subsequent owners of the task established in discussion with CoL and other partners.</p> <p>A deadline of December 2020 has been set for this initial work.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
9	<u>Recommendation</u> With immediate effect, in forces where Operation Snap (the provision of digital video footage by the public) has been adopted, chief constables should make sure that it has enough resources and process to support its efficient and effective use.	Under Consideration	August 2020	The force currently has not adopted Operation Snap. However, this is being looked at to further improve road safety and is being considered under the force Transform programme. A pilot is being scoped, including resources to support. No final decisions to implement has been made.
10	<u>Recommendation</u> With immediate effect, chief constables should satisfy themselves that the resources allocated to policing the strategic road network within their force areas are sufficient. As part of that process they should make sure that their force has effective partnership arrangements including appropriate intelligence sharing agreements with relevant highways agencies.	NEW GREEN	September 2020	Resources allocated to Roads Policing are currently assessed as meeting demand. TfL funding is currently consistent. The force Transform programme plans are reviewing this area and the commitment to an annual Road Police Strategic Threat and Risk Assessment [STRA] will ensure that resourcing continues to be assessed.
11	<u>Recommendation</u> By 1 August 2021, the College of Policing should include a serious collision investigation module for completion along with the Professionalising Investigation Programme. This should include: <ul style="list-style-type: none"> • minimum national training standards; and • certification for all serious collision investigators. Chief constables should make sure that all serious collision investigators in their force are then trained to those standards.	WHITE	August 2021 for the College of Policing	This action is initially for the College of Policing However force will include any College of Policing requirements in its training plans

Recommendations & Areas for Improvement		Status	Due Date	Comment
12	<u>Recommendation</u> With immediate effect, chief constables should make sure that appropriate welfare support is provided to specialist investigators and family liaison officers involved in the investigation of fatal road traffic collisions.	AMBER	August 2020 for initial response October 2020 for the review	Currently TRIM [Trauma Risk Management] and welfare support through Occupational Health service are available – these arrangements are being reviewed to establish if they are fit for purpose / more support required.
13	<u>Recommendation</u> By 1 April 2021, the College of Policing and the National Police Chiefs' Council should establish role profiles for defined functions within roads policing and identify the required skills and capabilities.	WHITE	April 2021	This an is for the College of Policing and NPCC
14	<u>Area for Improvement</u> Force-level support to national roads policing operations and intelligence structure is an area for improvement.	AMBER	September 2020 Extended to January 2021 pending future regional and national meetings taking place]	The responses below are provided within the context of this area for improvement within the HMICFRS report: The force engages in national campaigns. National and Regional levels meeting were attended by Inspector [Roads Policing]; future representation will be additionally at Superintendent level. The force does provide data to national roads policing operations and intelligence unit. This action is held at amber pending Superintendent level representation at national and regional meetings and the deadline extended [subject to future meeting taking place].

Recommendations & Areas for Improvement		Status	Due Date	Comment
15	<p><u>Area for Improvement</u></p> <p>The efficient and effective exchange of all collision data with other relevant bodies is an area for improvement.</p>	AMBER	<p>September 2020 [subject to review]</p> <p>Now November 2020</p>	<p>The responses below are provided within the context of this area for improvement within the HMICFRS report:</p> <p>Data collation and analysis, evaluation and effectiveness of the Road Danger Reduction Partnership and active travel plan need to be improved as referenced above. However the force does use the Crash system to report to DfT and TfL, although with the caveat of data accuracy.</p> <p>Analyst support is essential to achieving this.</p> <p>Progress is linked to 6 above; deadlines have therefore been aligned.</p>
16	<p><u>Area for Improvement</u></p> <p>The awareness and understanding of the changes in the Professionalising Investigation Programme within police forces is an area for improvement.</p>	AMBER	November 2020 for initial response	Learning and Development are currently reviewing.

Child Protection – City of London Police

A HMICFRS **force** report

Published 10th July 2020

There are 6 recommendations for the force, 3 are complete and 3 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u></p> <p>We recommend that City of London Police should immediately review the vulnerability training for its staff in all roles, to improve the understanding of the importance of engaging with children and in understanding their perspectives to improve safeguarding activities that deliver better outcomes for those children.</p>	NEW GREEN	November 2020	<p>A 'focus on' voice of the child briefing is currently in development to be delivered to all frontline officers and staff publication September/October 2020.</p> <p>A workshop has taken place to consider alternative ways to provide and embed important safeguarding information/processes across the force - this could see the development of 'Safeguarding Champions' together with a number of other initiatives that are being put forward for consideration.</p> <p>The force will be updating its vulnerability training with stronger focus on voice of the child. This to include separate sessions for supervisors and include the importance of recording.</p> <p>Public Protection Unit is delivering this training to all uniform groups, which may include an external speaker from PACT (Prison Advice and Care Trust) on the impact on children of officers attending addresses, arresting parents in front of children etc. This will be completed on group training days.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>A step by step guide on how and when to complete a Public Protection Notice [PPN] including information on Voice of the Child circulated in June 2020 to all frontline staff.</p> <p>An example PPN has been added to the 'show me' area of the intranet.</p> <p>[1.3, 1.4, 1.5]</p>
2	<p><u>Recommendation</u></p> <p>We recommend that, within three months, City of London Police should review its systems and practice to ensure that:</p> <ul style="list-style-type: none"> • [1]warning markers and flags are used to alert responders to risk and vulnerability; and • [2]]Control room staff have effective systems to help them to prompt frontline responders to follow force policy – for example, to turn on body-worn video cameras when attending domestic abuse incidents. 	AMBER	November 2020	<p><u>Bullet 1</u></p> <p>All incidents attended are checked for intelligence by the Response Intelligence Officer [within Control] who are on Duty 24/7. They will check all systems (including surrounding Forces) for any intelligence or flags associated with the address or individuals and as standard these would be communicated to the officers attending.</p> <p>These checks would also include specific police databases for violent and sexual offenders.</p> <p>Force Control and Public Protection have met to discuss further.</p> <p><u>Bullet 2</u></p> <p>New onscreen messaging is being explored within the control system enabling Control operators to prompt officers with best practice [including Body worn video].</p> <p>[2.1 – 2.12]</p>
3	<p><u>Recommendation</u></p> <p>We recommend that City of London Police should immediately act to improve child protection investigations by ensuring that:</p> <ul style="list-style-type: none"> • [1]there is effective supervision; 	NEW GREEN	September 2020	<p><u>Bullet 1 and 2</u></p> <p>A standard of expectations for supervision is has been included within the Child Protection SOP.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<ul style="list-style-type: none"> • [2]timely referral and strategy discussions take place; and • [3]body-worn video is accessible to all investigators. 			<p>Supervisors will follow the safeguarding supervision template [with Niche] at point of review and closure to ensure issues are considered.</p> <p>Supervisors will ensure deadlines are set for actions and follow up on these in monthly reviews</p> <p>The safeguarding checklist includes opportunities to reduce vulnerability were raised with partner organisations and that the voice of the child has been adequately recorded.</p> <p><u>Bullet 3</u> If a CoLP officer/ staff has an account with evidence.com, then they will have access to any piece of footage that has been uploaded to the system.</p> <p>[4.1 – 4.8]</p>
4	<p><u>Recommendation</u></p> <p>We recommend that, within three months, City of London Police should act to improve child protection investigations by reviewing its systems for investigating online child abuse and by establishing effective arrangements to identify and tackle those who download and distribute indecent images of children in its area.</p>	NEW GREEN	October 2020	<p>All downloaded mobiles will be checked against the national child abuse image database.</p> <p>Head of Public Protection Unit has spoken to MPS online investigation team (June 2020) and confirmed process for referrals between forces should an IP [Internet Protocol] address be resolved to City/Met address. MPS have confirmed that over previous 4 years no IPs have been resolved to City addresses.</p> <p>There is no need for separate SLA with MPS as this is national process.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				Information has been included within Child Protection SOP around targeting online offenders. [4.9 – 4.13]
5	<u>Recommendation</u> We recommend that City of London Police should immediately review the management arrangements for sex offenders and violent offenders in its public protection unit, including its supervision and management processes, so that it is satisfied that the unit is fully effective within its terms of reference. The aims should achieve: <ul style="list-style-type: none"> • [1]the timely completion and update of risk management plans; • [2]timely and unannounced home visits being made to registered sex offenders; and • [3]timely recording of intelligence on force systems. 	RED	September 2020	<u>Bullet 1, 2 and 3</u> Weekly offender management meetings with Head of Public Protection review these areas. VISOR [Violence / Sexual offender] alerts have been set up to ensure staff arrange [MOSOVO] visits within required timescales. This forms part of dashboard reviewed and monthly meetings. Next steps: MOSOVO [Management of Violence/Sexual Offenders] SOP has been drafted to include City specific processes, reporting and supervision – signoff and publication pending. [7.1 -7.4]
6	<u>Recommendation</u> We recommend that, within three months, City of London Police should introduce improvements to the arrangements for the attendance of appropriate adults, so that these are timely and sufficient to support children while they are in police detention.	NEW GREEN	August 2020	Monitoring arrangements are in place to ensure excess delays are avoided. Dip samples and monitoring at Custody Management Group also take place. Reassurance has also been sort that HMICFRS concerns regarding a singular fail have been captured for learning purposes.

Counter-terrorism policing

An inspection of the police's contribution to the government's Prevent programme

A thematic report HMICFRS and HMI Probation

Published 9th March 2020

There are 8 recommendations of which 1 is for the force and complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
7	<u>Recommendation</u> With immediate effect, the NPCC national Prevent lead and each force Prevent lead should review the attendance of force representatives at Channel panels so that police are correctly represented by decision makers who can contribute to managing risk.	NEW GREEN	No date set by HMICFRS Force deadline September 2020	Force representation at Channel panels has been reviewed by Deputy Head of Special Branch and deemed appropriate. The relevant Prevent Officer attends often with their supervisor.

Integrated Offender Management

Joint national thematic report HMICFRS and HMI Probation

Published 28th February 2020

There are 11 recommendations of which 4 are for the force and complete

Recommendations & Areas for Improvement		Status	Due Date	Comment
7	<p><u>Recommendation</u></p> <p>Chief Constables, National Probation Service Divisional Directors and Community Rehabilitation Company Chief Executive Officers should: define their IOM operating model and produce practice guidance that sets out clearly what is required by each agency at every stage of the IOM supervision process.</p>	NEW GREEN	November 2020	<p>Offenders managed within an Integrated Offender management [IOM] approach are done so within the area in which they are resident. There are no resident offenders that require IOM within the City. The CoLP have joint working relationships with forces that own nominals that offend in the City.</p> <p>A Standard Operating Procedure has been produced and published. Nominals are reviewed monthly at cross boarder IOM meetings. The force has an IOM team which undertakes a range of functions including, but not restricted to:</p> <ul style="list-style-type: none">Monitoring local crime to identify IOM nominalsLiaison with owning IOM units in other forces to seek assistanceWorking with owning IOM units to impose restrictive measures on IOM offendersDevelop and maintain relationships with national IOM law enforcements partners. <p>The force is aware that the NPCC lead for Integrated Offender Management is considering changes to this area of work however</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				there are no proposals and any changes will be picked up as business as usual.

National Child Protection Inspections: 2019

National thematic report HMICFRS

Published 27th February 2020

The report makes 6 recommendations of which 3 are for forces. The force is progressing 2 actions, 1 is closed since the force has been inspected by the National Child Protection Inspection Team.

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<u>Recommendation</u> We recommend that chief constables take steps to reduce the unnecessary criminalisation of children. Such steps could include (but don't need to be limited to) considering fully a child's circumstances when making decisions; more effective use of legislation to discontinue prosecutions not in the public (or child's) interest; the development of more effective non-criminal justice pathways for vulnerable children who commit lower level crimes.	AMBER	No date set by HMICFRS September 2020 for the review November 2020 to deal with the	Crime Directorate identified a resource to conduct a review which has been completed. A number of actions have been identified to ensure that sufficient guidance and training is available to officers. Deadline rationale: The deadline has been set to November 2020 to deal with issues arising from the review.

Recommendations & Areas for Improvement		Status	Due Date	Comment
			outcomes of the review	
5	<p><u>Recommendation</u></p> <p>We recommend that chief constables should review performance management and quality assurance approaches to ensure that assessments of the nature and quality of decision making are routinely made. The purpose of this would be to reinforce the understanding that compliance with policy or process is only one part of effective practice.</p>	AMBER	<p>No date set by HMICFRS</p> <p>September 2020 for the review</p> <p>November 2020 to deal with the outcomes of the review</p>	<p>Volumes of juveniles in custody are low and dip sampling rates of their records are high and can be up to 100% of monthly throughput.</p> <p>These custody records are assessed both for PACE and voice of the child. Superintendent visits are performed to assess the welfare/experiences of juveniles in custody – enabling first-hand experience of be gained of the juveniles circumstances.</p> <p>The results of dip samples, together with quarterly figures are reviewed at Custody Management Group. Analysis includes age, gender, ethnicity, and offence type and detention time.</p> <p>Delivery of training to Custody staff is also planned encompassing voice of the child.</p> <p>The deadline has been extended to align with recommendation 3 above and the actions necessary from the review.</p>

Evidence led domestic abuse prosecutions

National Joint report HMCPSi and HMICFRS

Published January 2020

This report makes 8 recommendations, 6 for the force and complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Recommendations</u> As well as the Crown Prosecution Service's bespoke e-learning, which all Area prosecutors have to complete, the police and Crown Prosecution Service should ensure that refresher training in domestic abuse, and particularly evidence led cases, is available to staff as appropriate.	NEW GREEN	No deadline set by HMICFRS July 2020 by the force	Learning and Development have scheduled for a virtual 'Focus on Domestic Abuse' session This session is part of a series provided on differing subjects to refresh officer knowledge, skills and understanding. The Public Protection Unit is delivering training to all uniform groups and custody.
3	<u>Recommendation</u> The police should review training plans in order to ensure that all appropriate staff, both frontline officers and investigators, are trained how to handle domestic abuse cases.	NEW GREEN	No deadline set by HMICFRS July 2020 by the force	Guidance via email was issued in July 2020 and covered evidence led prosecutions and the need to ensure body worn video is used appropriately. Additionally Control and Public Protection unit are meeting to discuss how the force response could be further improved – looking at the use of checklists to ensure officers are doing all that is required.

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<p><u>Recommendation</u></p> <p>Police forces should ensure that training, messaging and guidance is clear that evidence led cases should benefit from the same quality of investigation, early gathering of evidence and supervisory oversight as other domestic abuse cases, particularly in cases where the victim does not support police action. Domestic abuse champions should reinforce this message.</p>	NEW GREEN	<p>No deadline set by HMICFRS</p> <p>Set to July 2020</p>	<p>Training material around evidence led prosecutions has been rolled out previously; this included a video/case study of a City investigation.</p> <p>There is a dedicated section on evidence led prosecutions in the Domestic Abuse SOP which is prescriptive on what is expected. Each Domestic Abuse crime is reviewed by Public Protection supervisors and an entry has to be put on niche to detail whether 'Evidence Led' is appropriate.</p> <p>The force benefits from external scrutiny of failed DA court cases and cautions, alongside statistics from CPS meetings which are attended by the DI PPU.</p> <p>The force does not have domestic abuse champions, this role is recognised force-wide as PPU.</p>

Cyber: Keep the light on

A national report by HMICFRS

Published October 2019

This report makes 5 recommendations, 4 are for the force [or in part]. 2 are complete, 2 are in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u></p> <p>By 1 November 2020, the Home Office, the Cabinet Office, the National Police Chiefs' Council's lead for cyber crime and Coordinator for Economic Crime, the Director General of the National Crime Agency, and interested parties should revise the current police structure for the response to cyber-dependent crime. In doing so they should consider:</p> <ul style="list-style-type: none"> • the creation of a national police cyber-dependent crime network; • the remit of any such network; • how the network engages with other law enforcement agencies; and • the tasking and co-ordinating responsibilities that will be required for the network to be effective. 	<p>Previously CLOSED [not for the force] this is now WHITE since the Commissioner is now the new NPCC lead</p>	November 2020	<p>Bullets 1 through 4 are the remit, in part, of the NPCC lead and were not for the force to progress until August 2020 when the Commissioner became the NPCC lead following the retirement of CC Goodman.</p> <p>To date progress has been held pending the outcome of the independent serious and organised crime review led by Sir Craig Mackey.</p>
2	<p><u>Areas for improvement</u></p> <p>Chief constables should evaluate the use that their force makes of cyber specials and volunteers to ensure that they are used effectively.</p>	<p>NEW GREEN</p>	November 2020	<p>NFIB has engaged with Special Constables, and considered where they could their support the relevant areas within Cyber, unfortunately without success.</p> <p>The force remains open to the use of specials and volunteers in specialist functions as has been demonstrated in other areas pf the force.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				The Cyber Protect UK Network, consisting of all forces and Regional Organised Crime Units utilise volunteers for Cyber activity.
4	<u>Areas for improvement</u> The National Police Chiefs' Council's lead for cyber crime and Coordinator for Economic Crime should revise the key performance indicators contained within the council's minimum capability standards for force cyber crime units. The revised standards should make clear: <ul style="list-style-type: none"> • [1]the minimum standards for investigation; • [2]the role of regional cyber crime co-ordinators in the recording, management, and review of cyber crime investigations; and • [3]the use of the weekly list provided by the National Fraud Intelligence Bureau to comply with the performance indicators. 	AMBER	No deadline set by HMICFRS November 2020 for an initial position	Bullets 1 and 2 are the remit of the NPCC lead and were not for the force to progress until August 2020 when the Commissioner became the NPCC lead following the retirement of CC Goodman. A deadline has been set for an initial position to establish what progress/or otherwise has been made against this area for improvement.
		NEW GREEN	No deadline set by HMICFRS Force deadline July 2020	Bullet 3 – the use of the weekly lists Revised guidance has been produced which is sent together with the weekly lists provided by the National Fraud Intelligence Bureau. This guidance is specific in the purpose for which the list is to be used. This guidance will be reviewed upon any future standards set by the NPCC lead for Cyber Crime. The performance indicators referred to within the recommendations were set by the National Board Force Specialist Cyber Capability Project Board. Any future plans with regard to bullet 1 and 2 [NPCC lead] will be handled within business as usual.

Shining a light on betrayal: Abuse of position for a sexual purpose

A national report by HMICFRS

Published September 2019

This report makes 6 recommendations, 1 sub-divided. 4 are for the force, 3 complete and 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment	
4a	<u>Recommendation</u> By April 2020, all forces that haven't yet done so should: <ul style="list-style-type: none"> • [1]record corruption using the national corruption categories; • [2]produce a comprehensive annual counter-corruption strategic threat assessment, in line with the authorised professional practice; and • [3] establish regular links between their counter-corruption units and those agencies and organisations who support vulnerable people. Where forces are yet to implement an effective ICT monitoring system that allows them to monitor desktop and handheld devices, they should do so as soon as reasonably practicable.	AMBER	April 2020 Now November 2020 [Subject to Co-vid] Aligned to PEEL 2018/2019 AFI 11	GREEN	Bullet 1 - The force is compliant recording corruption based on national corruption categories.
				GREEN	Bullet 2 - The force has produced a current force counter corruption Strategic Threat Assessment and control strategy 2020/21. The Control Strategy is to be published both on the force intranet and in the force's internal Professionalism Newsletter to raise awareness of the greatest identified threats.

Recommendations & Areas for Improvement		Status	Due Date	Comment	
				AMBER	<p>Bullet 3 - PSD have established and successfully recruited to a new post of Engagement Officer. Part of the remit of this post is to establish links and encourage reporting by partners of any (corruption) issues encountered including matters of Abuse of Position (for a Sexual Purpose) which they may encounter. The mechanism is now in place to deliver this. PSD recently published an article to the business community in Skyline on 6th February 2020 which encouraged companies to get in touch if they had any concerns and explained the work of the CCU. The force regularly attends the SE Regional Counter Corruption Practitioners Group, chairs the SE Regional Analysts meeting and attends other national groups.</p> <p><u>New IT system</u> Previously delayed pending the release of a Microsoft 365 compatible version; testing has been completed by the supplier in 2 forces.</p> <p>Roll out was expected by September 2020, however it is understood that this may be delayed and a revised timeline for delivery is being determined.</p>

Leading Lights: An inspection of the police service's arrangements for the selection and development of chief officers

A national report by HMICFRS and HMICS [Scotland]

Published August 2019

This report makes 9 recommendation 1 of which is for the force and complete.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	<p><u>Recommendation</u></p> <p>By 31 July 2020, the College, with support from the National Police Chiefs' Council, HMICFRS, HMICS and police forces, should establish and begin operation of a national workforce planning function for all chief officer posts in the United Kingdom. The function should, as a minimum, include:</p> <ul style="list-style-type: none">• the maintenance of a skills, competencies and career-history database on eligible candidates;• the maintenance of similar information about the current membership of chief officer teams;• the creation of lists of candidates who fit specific vacancies;• an executive search function to advise forces on candidates who would best complement their existing teams; and• a career support facility to advise candidates on roles and other development opportunities that would help meet their career aspirations.	NEW GREEN	July 2020	<p>The College of Policing has confirmed that this recommendation has been met by their Senior Hub programme which is now live and already has a number of initiatives that were suggested as part of the HMICFRS review.</p> <p>The College holds a Chief Officer database, it is currently up to date and the College will contact the force if they require any further information.</p>

Crime Data Integrity inspection 2019

A force report by HMICFRS

Published August 2019

This report makes 6 areas for improvement for the force; 4 are complete, 2 to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
5	<u>Area for Improvement</u> The force should immediately improve its collection and analysis of equality data through its crime reporting and recording systems	AMBER	February 2020 Extended to September 2020 Now extended to January 2021 to confirm improvements are embedded	Age and gender have already been recognised within the HMICFRS report as being collected. The force has issued guidance regarding the recording of ethnicity and is now a mandatory field on the force crime recording system. Disability and sexuality data remain to be collected and analysed. Rationale: Deadline further extended to ensure measure already taken are embedded and establish if work-arounds can be established for the collection and analysis of disability and sexuality data
6	<u>Area for Improvement</u> The force should immediately improve its use of cannabis warnings, penalty notices for disorder and community resolutions, to make sure it only issues them in accordance with national guidance.	RED	February 2020 Extended to July 2020 but	Audit results have not met the desired standards and further steps are now being taken: <ul style="list-style-type: none"> The Community Resolution process is being digitised – roll out imminent.

Recommendations & Areas for Improvement		Status	Due Date	Comment
			<p>need to be reviewed [Reported to PAB]</p> <p>Extended to September 2020 to ensure improvements are embedded</p> <p>Extended to January 2021</p>	<ul style="list-style-type: none"> Guidance will be re-issued to officers for Community Resolutions, penalty notices for disorder and Cannabis Warnings A 3 step escalation process for failures is being implemented, at the highest levels this could lead to management action of officers. Monthly audits will be conducted; failures reported to Supt Ops UPD The force Corporate Communications department will be engaged to support messaging Digitisation of Cannabis Warnings and PND will be pursued. <p>Initial improvements were observed but not sustained and additional management actions is necessary.</p>

The Poor Relation - The police and CPS response to crimes against older people

A national report by HMICFRS
Published July 2019

This report makes 23 recommendations, 5 of which are for force. 4 recommendations are complete 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
10	Cause of concern Some victims may not be receiving support services, and some support services don't work as well as they could. This is	AMBER	January 2020	The HMICFRS report recognises the good work of Economic Crime Victim Care Unit (ECVCU). There has been activity against this recommendation; dip sampling to ensure victim code of practise has

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>because the police don't always refer victims when they should, support services don't have ready access to police information, and witness care arrangements are sometimes provided separately.</p> <p><u>Recommendation</u> Within six months, chief constables should work with police and crime commissioners and their mayoral equivalents, and other relevant organisations, to review whether victim support services can be provided in a better way.</p>		<p>Extended to November 2020 [Previously Reported to PAB]</p>	<p>been complied with – findings reported to Force Crime Standards Board.</p> <p>Rationale for deadline extension The force had plans to conduct 'victim journey' workshops which would have contributed as evidence for this. However the initial response to Co-vid has put this work on hold for the time being until a safe way to do this can be explored.</p> <p>With regard to non-economic crime victims: The force undertakes dip samples to identify learning which is then reported to the Crime Standards Board, these dip samples include qualitative checks on the service provided.</p> <p>Next Steps Evidence that victims services have been reviewed [with partners] to establish if they can be enhanced, is still required. This element is being progressed by the force victim champion. Victim journey workshops are now progressing and expected to commence by October 2020.</p>
17	<p><u>Area for improvement</u> Within six months, chief constables should find good ways to assess the current demands on the police made by older people. These assessments should include a prediction of future changes in demand, account for the work of other organisations, and be incorporated into FMSs.</p>	NEW GREEN	<p>January 2020</p> <p>However HMICFRS do not</p>	<p>An analysis of all crime types, banded by the age of victims has been undertaken. This will enable the force to track trend changes over time.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
			require the FMS to be submitted at this time September 2020 for review	This analysis shows that victims over 58 are 6% of the total number of victims. Demand for calls for service by age analysis has been explored. However the force Control Room system does not facilitate the collection of this type of data. Findings have been incorporated into the FMS

PEEL 2018/2019

A force report by HMICFRS

Published May 2019

This report makes 11 areas for improvement for the force; 9 complete 2 to be progressed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Area for Improvement</u> The force should implement a process to get feedback from vulnerable victims.	AMBER	December 2019 set to align with the next inspection anticipated early 2020.	The requirement to survey domestic abuse victims is a mandatory home office return. Previously performed by the Vulnerable Victim Advocate [VVA], when funded by MOPAC and the force. In 2019 MOPAC redirected funding away from the City and the force now has access 2.5 days per week to an Independent Domestic Violence Advocate [IDVA] under the Pan London Victim and Witness Scheme. Vetting and recruitment [victim support] delayed the starting of the IDVA. Although the force now has access to an IDVA the Head of

Recommendations & Areas for Improvement		Status	Due Date	Comment
			<p>Reset to June 2020 [Reported to PAB]</p> <p>Extended to November 2020 subject to further review</p>	<p>Domestic Abuse Services at Victim Support as indicated that surveying falls outside the scope of this role.</p> <p>This HMICFRS area for improvement seeks Domestic Abuse surveying to be expanded to other vulnerable victims – increasing demand.</p> <p>The way ahead has been discussed with the Corporation [Alex Orme and David Macintosh] and a successful bid for POCA funds to Safer City Partnership [18/9/2020] has been made. The Head of PPU is now in discussion with Victims Support for the expansion of the service.</p> <p>This is not seem as a long term fix and the POCA bid included an element to commission an independent review of the Domestic Abuse/Vulnerable victim service provided across the City to include VVA, MOPAC, IDVA and the services the corporation provide. Domestic abuse surveys are to be conducted by officers of PPU as an interim measure to meet Home Office requirements.</p> <p><u>Deadline Rationale</u></p> <p>A revised deadline of November 2020 is set to review the current position.</p>
5	<p><u>Area for Improvement</u></p> <p>The force should strengthen its response to county lines, which are criminal networks involved in the distribution of drugs to</p>	NEW GREEN	December 2019 set to align with	A peer review was conducted by the National County Lines Co-ordination Centre 20th and 21st November 2019 – the force received a favourable hot debrief and a report was anticipated

Recommendations & Areas for Improvement		Status	Due Date	Comment
	different areas of the country that frequently exploit children and vulnerable people.		<p>the next inspection anticipated early 2020.</p> <p>Now March 2020 pending outcome of peer review.</p> <p>Extended to October 2020 [previously reported to PAB]</p>	<p>January 2020 but a draft report not received until February 2020. A final report has not been received by the force and has been chased.</p> <p>Noting that the report is unlikely to materially change the force has developed a programme of works in response.</p>
11	<p><u>Area for Improvement</u></p> <p>The force should ensure that its counter-corruption unit:</p> <ul style="list-style-type: none"> • has enough capability and capacity to counter corruption effectively and proactively; • can fully monitor all of its computer systems, including mobile data, to proactively identify data breaches, protect the force's data and identify computer misuse; and • builds effective relationships with individuals and organisations that support and work with vulnerable people. 	AMBER	<p>December 2019 set to align with the next inspection anticipated early 2020.</p> <p>Now November 2020</p>	<p>The first point has been addressed and recruitment is now complete and officers are in post and will continue to work on point three.</p> <p>In terms of the second point: New IT system.</p> <p>Previously delayed pending the release of a Microsoft 365 compatible version; testing has been completed by the supplier in 2 forces.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
			[Subject to Co-vid]	Roll out was expected by September 2020, however it is understood that this may be delayed and a revised timeline for delivery is being determined.

Fraud: Time to Choose

A national report by HMICFRS

Published April 2019

This report makes 18 AFIs and recommendations for the force, 17 are complete 1 in progress.

Recommendations & Areas for Improvement		Status	Due Date	Comment
1	<p><u>Recommendation</u></p> <p>By 30 September 2019, the National Police Chiefs' Council Coordinator for Economic Crime should publish a timetable for implementing the revised Know Fraud system, making clear which services are to become available at each stage of implementation and thereby enabling forces to make use of each service as early as practicable.</p> <p>The use made of the system by police forces should be monitored and evaluated to identify best practice.</p>	AMBER	<p>September 2019, March 2020</p> <p>Extended to November 2020 [Previously reported to PAB]</p>	<p>The requirement is to publish a timetable for implementing the revised Know Fraud system, making clear which services are to become available at each stage of implementation and thereby enabling forces to make use of each service. The delayed delivery of enhancements and related issues with the contractor have prevented a timetable being produced and communicated with Chief Constables.</p> <p><u>Next Steps</u></p> <p>Further communications to Chief Constables are planned as key decisions are made regarding the way ahead. Next steps were considered at the Police Authority Board meeting on the 27th April 2020.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<u>Rationale for deadline extension</u> The deadline is extended to enable implementation of decisions made regarding the future delivery of the service. Future communication to Chief Constables is planned.

City of London Police – Joint inspection of police custody

A national joint report by HMI Prisons and HMICFRS

Published March 2018

This report makes 1 recommendation [complete] and 21 areas for improvement for the force of which 18 are complete, 3 are in progress

Recommendations & Areas for Improvement		Status	Due Date	Comment
2	<u>Area for Improvement</u> The force should ensure that there is sufficient oversight of how minimum staffing levels are maintained in the custody suite, and the level of overtime in use to achieve these.	AMBER	December 2019 to align with the HMICFRS return visit Now extended to July 2020, subject to review, to	A process is in place to monitor and review the availability of fully accredited staff. Overtime monitoring has been enhanced and authorisation changed to the Custody Manager from Group Inspectors. Duty planning allocate shifts to resilience officers to ensure they maintain their accreditation. An alternate process for allocation of resources was implemented; controlled by Custody Inspector. A dedicated Custody staffing group has been established on a 3 month rolling basis sourced from Response Groups, alongside Dedicated Detention Officers and Custody Goalers to improve both experience and skills and to better control cover and requirement for overtime. Work has been completed to reconcile skills records in the force training records system with a custody training Tracker. This has

Recommendations & Areas for Improvement		Status	Due Date	Comment
			align with Transform Now October 2020 to align with Transform subject to review	delivered accurate availability of Custody skills report and facilitates more effective use of Duty Management System for planning purposes. Custody management demand to be feed into the force change programme [Transform]. Tasks to be progressed: Transform programme [Custody] – work is ongoing; Custody being considered within the Investigation strand with proposals to develop alongside the Administration of Justice function in. Detailed staffing structure model being prepared.
3	<u>Area for Improvement</u> The force should address the unsatisfactory conditions that some detainees experience in the suite, especially those detained for long periods, and ensure that the facilities and arrangements for detainees with disabilities and those with limited mobility are suitable.	AMBER	December 2019 to align with the HMICFRS return visit Extend to November 2020	Van docking arrangements have been formalised. New design guidelines published by Home Office have been fed into the Accommodation Team. Accommodation Team have contacted National Police Estates Group (NPEG) who have agreed to conduct a review of force custody new build plans at the appropriate stage. This will include review of a series of key documents, a one day workshop plus interviews with relevant operational custody stakeholders. Tasks to be progressed: Original date scheduled for deep Clean and Maintenance works in Custody was delayed due to operational activities – this work is to be rescheduled – date to be confirmed.

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>Adaptions (lowering of call bell in 1 cell) and introduction of hatched 'no loitering area' in reception area are programmed to be delivered during Suite closure.</p> <p>Rationale for extending date: delays around co-ordination of maintenance/cleaning teams, use of BTP facilities and operational requirements of force.</p> <p>This is now further impacted by restrictions of CoVid-19 so deadline further extended to Nov 19 (but subject to ongoing review as circumstances allow).</p> <p>Opportunity for this work to be completed still not possible - will be progressed as soon as circumstances permit.</p> <p>A meeting has been scheduled for 21.09.20 with NPEG rep to review proposed layout for the new build Custody Suite</p>
5	<p><u>Area for Improvement</u></p> <p>The force should manage the health care contract effectively, with escalation to a senior level when the service falls below the standard required.</p>	NEW GREEN	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extended to July 2020</p>	<p>Performance data has begun to be defined, collected and analysed - work in progress following development of daily/monthly and quarterly Custody performance reports by Performance Information Unit.</p> <p>Immediate issue identified and challenged with contractor - recording successful coverage of shift when only partial cover provided. Reporting practices to be amended by contractor.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
6	<u>Area for Improvement</u> The force should improve its approach to performance management by collecting comprehensive information, and analysing this to show how well the service is performing and identify where improvements are needed.	NEW GREEN	December 2019 to align with the HMICFRS return visit Extended to June 2020	The force Performance Information Unit produce daily reports which include last 24 hours and 7 day statistics. Monthly performance reports are circulated to the Uniform Policing Directorate senior management team for oversight. The force Custody Management Group reviews use of force performance reports on a regular basis. Specific reports are also commissioned – including disproportionality. Quarterly reporting is ongoing to the force custody management group.
9	<u>Area for Improvement</u> Staff should routinely consider, and take any appropriate actions to preserve, detainees' privacy at the booking-in desk.	AMBER	December 2019 to align with the HMICFRS return visit Extended to Nov 2020	A mitigation has been identified [laptops utilised in a private side room] and has been communicated to officers and included within Continuing Professional Development - safeguarding and welfare responsibilities. Hatching 'no loitering' area in Reception to be marked up to minimise opportunity to view CCTV monitors, works originally scheduled for Nov 2019 cancelled due to operational requirements and to be rescheduled. New date not yet confirmed but has been followed up by Custody Manager. Plans for the new exercise yard at Bishopsgate have been reviewed by National Police Estates Group [NPEG] who has proposed some amendments, and existing contractor is in process of pricing up additional works.

Recommendations & Areas for Improvement		Status	Due Date	Comment
				Rationale for extending date: delays around co-ordination of maintenance/cleaning teams, use of BTP facilities and operational requirements of force. This is now further impacted by restrictions of CoVid-19 so deadline extended to Nov 2020 (but subject to ongoing review as circumstances allow).
12	<p><u>Area for Improvement</u></p> <p>The force should strengthen its approach to conducting PACE reviews of detention by:</p> <ul style="list-style-type: none"> • [1]ensuring that it meets the requirements of section 107 of PACE, so that all acting inspectors are appropriately authorised to perform the role and that this is clearly recorded on the custody record • [2]conducting rigorous reviews for detainees held in the custody suite on behalf of others forces, so that investigations are carried out promptly and that these detainees spend no longer than necessary in custody providing accurate and detailed entries on the custody detention log, reflecting the content of the review carried out and ensuring that all detainees are told the outcome of any review conducted while they were sleeping, as required by paragraph 15.7 of PACE code C. 	NEW GREEN	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extended to July 2020 subject to review</p>	<p><u>Requirements of section 107 of PACE – authorisation of acting / temporary inspectors – bullet 1</u></p> <p>Uniform Policing Directorate have determined that processes for authorisations being given are:</p> <p>a) planned /long term authorisations given in advance given and recorded at Uniform Policing Directorate Local Resource Planning meeting.</p> <p>b) for unplanned ad hoc duties.</p> <p>Authority for acting up to Duty / PACE Inspector on an ad hoc basis within Uniform Policing Directorate [UPD] is to be given via on-call UPD Supt and recorded in day-book.</p> <p>Acting and temporary duties SOP have been revised.</p> <p>Dip sampling specifically seeks to identify compliance.</p> <p><u>Reviews for detainees held in the custody suite on behalf of others forces – bullet 2</u></p> <p>Statement of Expectations for Custody Police Sergeants being reviewed. This will include requirement to escalate those cases to Duty Inspector which Custody officer considers are not being</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
				<p>progressed expeditiously with particular reference to 'other force' detained persons.</p> <p>Statement of Expectations for Duty Inspector also being reviewed, updated and reissued to include this requirement.</p> <p>Learning & Development [L&D] have prepared a lesson plan for role of Duty/PACE Inspector – training has been scheduled.</p> <p><u>Accurate and detailed entries on the custody detention log</u> Included with the dip sample process</p> <p>Rationale for deadline: Extend deadline to July 2020 to allow time for L&D to resource (extended period due to turnover of staffing within L&D impacting delivery timetable).</p>
17	<p><u>Area for Improvement</u></p> <p>The force should ensure that it consistently identifies when an appropriate adult is needed for a vulnerable adult, and that one is subsequently secured without undue delay.</p>	NEW GREEN	<p>December 2019 to align with the HMICFRS return visit</p> <p>Extended to June 2020</p>	<p>Completion of The Appropriate Adult Service memorandum of understanding is nearing completion - final amendments and sign-off pending. Appropriate adult cover being extended to include vulnerable adults as well as children and for 24/7.</p> <p>An area of work will continue under Business as usual - completion of The Appropriate Adult Service MOU, which the City of London Corporation are co-ordinating] and the associated elements of performance recording.</p>

Recommendations & Areas for Improvement		Status	Due Date	Comment
20	<p><u>Area for Improvement</u></p> <p>The recording of release arrangements, to ensure that detainees are released safely, should be more detailed.</p>	NEW GREEN	<p>December 2019 to align with the HMICFRS return visit</p> <p>Now March 2020</p> <p>Now July 2020</p>	<p>This was included in CPD sessions for Custody Officers held end of July 19.</p> <p>New dip sampling template examines this area with latest results showing that pre-release risk assessments are more comprehensive and detailed, showing actions the C/O has taken to ensure that the safety of the D/P is paramount upon release..</p> <p>Show Me Good documents prepared and placed on Force database including one for a Pre-release risk assessment.</p> <p>Review of travel assistance offered conducted. Petty cash v travel warrant v informal arrangements with TfL to support unfunded travel v use of police vehicle. Outcome, agreed to secure and supply warrants to cover both national (Network Rails) and local (TfL) warrants for issue to DPs as necessary to add to opportunities for safe release of DP.</p> <p>Work in hand to secure delivery of this improvement which will be introduced as soon as practicable, dependant on sourcing (Rail Delivery Group secured for overground, TfL still to be secured) and instituting agreeable financial arrangements.</p>

Policing and Mental Health - Picking Up the Pieces

A national joint report by HMICFRS

Published November 2018

This report makes 3 recommendations for the police; 2 are complete, 1 pending input from the College of Policing

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<p><u>Recommendation</u></p> <p>By August 2019, all forces should review their existing partnership mental health triage services to assess their effectiveness, and the environment they are operating in. This will help them make decisions about sustainable future services with partners to make sure mental health care needs are being met.</p> <p>If forces find any deficiencies in their triage services, they should take steps to address them as soon as reasonably practicable.</p> <p>The College of Policing has agreed to devise some practice guidelines to help forces benchmark their triage activity. We will inspect on progress in this area as part of our integrated PEEL assessments inspection framework.</p>	WHITE	August 2019	<p>Practise guideline from the College of Policing to help force benchmark their triage activity are pending.</p> <p>However this is something which the force already undertakes – the most recent assessment examined the period November 2018 to October 2019 and highlighted a business need for mental health nurse cover during the day.</p>

Understanding the difference: the initial police response to hate crime

A national joint report by HMICFRS

Published July 2018

This report makes 15 recommendations. 8 are for the force and 7 of these are complete, 1 is held at WHITE pending the outcome of a review by the NPCC lead and College of Policing.

Recommendations & Areas for Improvement		Status	Due Date	Comment
8	<p><u>Recommendation</u></p> <p>Our inspection shows that some hate crime victims get a better service than others. This is because forces apply the national minimum standard of response to victims of hate crime inconsistently.</p> <ul style="list-style-type: none"> • We recommend that, within six months, the NPCC lead for hate crime works with the College of Policing to review the operational guidance about the minimum standard of response to establish if it is still appropriate and relevant for forces • We recommend that, following the review, any agreed minimum standard of response for forces should be monitored by force governance processes, including external scrutiny. 	WHITE	January 2019	<p>This action is for the NPCC lead for hate crime and College of Policing.</p> <p>The force complies with current guidance issued by the College of police Hate crime operation guidance 2014.</p> <p>The College of Policing are reviewing their guidance and consultation closed 5/11/2019. There is currently no date for formal publication. College of Policing APP website last checked 25/9/2020.</p>

PEEL: Police Effectiveness 2017 – National

A national report by HMICFRS

Published March 2018

This report was published 22nd March 2017. There are 4 recommendations which apply to the force and are to be progressed.

There are 4 recommendations which applies to the force; 3 are complete, 1 is held at WHITE pending input from the College of Policing

Recommendations & Areas for Improvement		Status	Due Date	Comment
3	<p><u>Recommendation</u></p> <p>The College of Policing, working with the NPCC leads, should develop an approach to peer review. This approach should</p>	WHITE	September 2018 And	Details of the peer review approach have not been released by the College of Policing at this time.

Recommendations & Areas for Improvement		Status	Due Date	Comment
	<p>support forces to work with each other to improve how they identify, respond to and keep safe vulnerable victims.</p> <p>The infrastructure to support peer reviews should be in place by September 2018 with the first reviews taking place by January 2019.</p>		January 2019	<p>Local peer review and opportunities to share best practice are being developed through the regional Vulnerability Steering Group chaired at commander level by the MPS. BTP are in attendance. The force submitted its Vulnerability Action Plan to the NPCC lead (Norfolk)</p> <p>Although broadly positive, feedback was received that we needed to improve our strategic training with partners. Supt UPD Ops is negotiating attendance for CoLP and relevant COL leads to attend the highly recommended MPS-designed Hydra exercise called the Strategic Partner Agency Safeguarding Exercise (SPASE) designed for senior leaders in policing, health, education, children and adult services.</p> <p>A review of the National Vulnerability Action Plan is due to be undertaken – the force has been invited to be part of the review team.</p>